From: Michael PINTO
To: Bury, Carolyn

Cc: <u>Fajardo, Juan;</u> <u>Bob WRIGHT</u>

Subject: Arkema East Plant Bi-Monthly Progress Report

Date: Monday, September 15, 2014 2:34:41 PM

Attachments: removed.txt

July August 2014.pdf

## Carolyn,

The July-August 2014 Bi-Monthly Progress Report for the Arkema East Plant is attached.

Michael Pinto

RETIA USA LLC/Legacy Site Services LLC 468 Thomas Jones Way, Suite 150

Exton, PA 19341 Office: 610 594-4435 Fax: 610 594-4439



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September 15, 2014

via electronic mail

United States Environmental Protection Agency Region V RCRA Enforcement Branch (HRE-8J) 77 Jackson Street Chicago, IL 60604 Attention: Carolyn Bury, Project Coordinator

Subject: Administrative Order

Docket No. V-W-89R-45

Arkema Inc.

Riverview, Michigan MID 005 363114 Progress Report #147

Dear Ms. Bury:

In accordance with Task IV, Subtask B of Attachment IV to the above-referenced Administrative Consent Order (ACO), this letter will serve as the Bi-monthly Progress Report covering corrective action activities for the East Plant during the period of July and August 2014. A bi-monthly progress report for activities at the West Plant and West Brine Field will be submitted under separate cover by Mr. Bob Wright of Arkema Inc. (Arkema).

This report describes progress during the reporting period towards fulfilling the requirements of the ACO. A description of the activities anticipated for May and June 2014 is also included.

## I. East Plant Activities Completed in July and August

CMS Task IV

The CMS is currently under review by USEPA.

LSS continues to cooperate with GLNPO and other non-federal parties to complete a design for a Great Lakes Legacy Act remediation project in the Trenton Channel.

### Interim Remedial Measures

Operation of the Halowax groundwater containment system continued. Since pumping began in 2001, 1,246,620 gallons of groundwater have been extracted and treated by the Halowax Area treatment system and approximately 495 gallons of DNAPL have been recovered and properly disposed. A total of 7,810 gallons of groundwater were extracted and treated during the reporting period.

The reduced bi-monthly flow as due to a faulty solenoid valve that malfunctioned in early August, shortly after the July 2014 inspection. The solenoid valve was replaced and normal flow has been restored.

## Other Activities

Second Quarter groundwater monitoring was performed.

# II. Corrective Action Activities Anticipated for September and November 2014

### CMS Task IV

LSS will await EPA approval and/or comments on the CMS.

### Interim Remedial Measures

Operation and maintenance of the Halowax groundwater containment system will continue.

The Second Quarter 2014 Area 17 groundwater monitoring report will be submitted to EPA.

## Other Activities

Third Quarter 2014 Area 17 groundwater monitoring will be performed.

Work will continue on the GLLA Trenton Channel project.

Based on the above information, LSS believes that all project activities during the reporting period were in full compliance with the requirements of ACO. If you have any questions or comments regarding this information, please call me at (610) 594-4435.

Sincerely,
Mult Pinto

Michael Pinto

Principal Environmental Engineer

Legacy Site Services, LLC

cc: Mr. Peter Quackenbush- MDNR - Waste Management Div. Lansing

Mr. Laura Verona- MDNR - Waste Management Div. Livonia